

AO91 (Rev. 8/01) Criminal Complaint

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

MAR 30 2007
Michael N. Milby, Clerk
Laredo Division
AAF

UNITED STATES OF AMERICA

V.

*F.D.P.
Det. 1/P.E.
next day
Det. 1/P.E.
X 6/01*Martha Guerrero
Mission, Texas
United StatesRoberto Medina Martinez
Reynosa, Tamaulipas
Mexico

(Name and Address of Defendants)

CRIMINAL COMPLAINT

Case Number:

L-07-MJ-530-01
-02

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about March 26, 2007 in Hebronville, Texas Jim Hogg County, in the Southern District of Texas, Martha Guerrero and Roberto Medina Martinez defendant(s),

a United States citizen and Mexican citizen, did unlawfully transport Honduran alien Sila Lorena Mejia Santa and (2) others by means of a motor vehicle within the Southern District of Texas knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title 8 United States Code, Section(s) 1324 (a) (1) (A) (ii)

I further state that I am a(n) Senior Border Patrol Agent and that this complaint is based on the Official Title

following facts: based on statements of the accused and records of the Immigration & Naturalization Service.

Continued on the attached sheet and made a part of this complaint: Yes No

victor
Signature of Complainant

Victor Villarreal

Printed Name of Complainant

Sworn to before me and signed in my presence,

March 29, 2007

Date

at

Laredo, Texas

City and State

Adriana Arce Flores

U.S. Magistrate Judge

Name and Title of Judicial Officer

aaflres
Signature of Judicial Officer

United States of America

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vs

**Martha Guerrero
Roberto Medina Martinez**

[CONT OF BASIS OF COMPLAINT]

On March 26, 2007 at about 11:15 p.m., a green sedan approached the primary inspection lane at the Border Patrol Checkpoint located on Farm to Market Road 1017 near Hebbronville, Texas. The occupants inside the vehicle were questioned as to their citizenship and one of the passengers refused to answer. The driver was referred into secondary inspection.

In secondary, the driver was identified as Martha Guerrero, a United States citizen. Her front seat passenger was identified as Roberto Medina Martinez, an illegal alien from Mexico. Three other passengers were questioned and determined to be illegal aliens from Mexico and Honduras. All of the subjects were placed under arrest and read their Miranda Rights.

Furthermore, it was established through a sworn statement given by Martha Guerrero that Roberto Medina Martinez and her picked up the three illegally aliens in McAllen, Texas, knew they were illegally in the United States and agreed to transport them to Yoakum, Texas for \$1,200.00 each.